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February 22, 2001

By Overnight Courier

Mr. Gary Walsh, Executive Director
Public Service Commission of South Carolina
Saluda Building
101 Executive Center Drive
Columbia, SC 29210

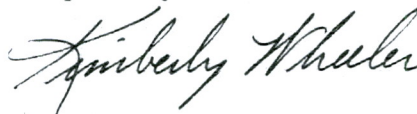
Re: Informal Request for Approval of NPA Relief Plan for the 803
Area Code

Dear Mr. Walsh:

Pursuant to Section 103-820 of the Commission's rules, enclosed for filing are an original and ten copies of an informal request of NeuStar, Inc. Please date-stamp the enclosed return copy as received and return it in the enclosed self-addressed stamped envelope.

If you have any questions regarding this matter, please contact the undersigned.

Respectfully submitted,



Kimberly Wheeler
Counsel for NeuStar, Inc.
North American Numbering Plan
Administrator

Enclosure

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Executive Director
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Re: Informal Request of NeuStar, Inc., as the North American
Numbering Plan Administrator and on behalf of the South
Carolina Telecommunications Industry, for Approval of
NPA Relief Plan for the 803 NPA

Dear Mr. Walsh:

NeuStar, Inc., the North American Numbering Plan Administrator ("NANPA"),
in its role as the neutral third party NPA Relief Planner for South Carolina under the
North American Numbering Plan and on behalf of the South Carolina
Telecommunications Industry ("Industry"),¹ requests that the Public Service
Commission of South Carolina ("Commission")² approve the Industry's consensus

¹ The Industry is composed of current and prospective telecommunications carriers operating in, or considering operations within, the 803 area code of South Carolina.

² The Federal Communications Commission ("FCC") delegated authority to review and approve NPA relief plans to the states. See 47 C.F.R. § 52.19 (1999).

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decision to recommend to the Commission an all-services distributed overlay plan for relief of the 803 Numbering Plan Area ("NPA").³ The Industry submits its recommendations to the Commission based upon NANPA's projections that absent NPA relief, the supply of central office codes (often referred to as "CO" or "NXX" codes) for the 803 NPA will exhaust during the second quarter of 2003.⁴ In order to allow sufficient time for completion of the selected relief plan prior to exhaust of CO codes in the 803 NPA, the Industry recommends that the Commission approve its recommended seventeen month implementation schedule. In support of this request and on behalf of the Industry, NANPA submits the following:⁵

I. BACKGROUND

The 2000 Central Office Code Utilization Survey ("COCUS") projections for CO code utilization indicate that the 803 NPA will exhaust during the second quarter of

³ As the neutral third party administrator, NANPA has no independent view regarding the relief option selected by the Industry.

⁴ In order to plan for the introduction of new area codes, NANPA and the Industry utilize the NPA Code Relief Planning & Notification Guidelines (INC 97-0404-016, Nov. 13, 2000) ("NPA Relief Planning Guidelines"). The NPA Relief Planning Guidelines assist NANPA, the Industry and Regulatory Authorities within a particular geographic NPA in the planning and execution of relief efforts. The NPA Relief Planning Guidelines can be accessed on the ATIS web site located at <http://www.atis.org/atis/clc/inc/incdocs.htm>.

⁵ At the request of the Industry and Commission staff and pursuant to Section 103-820 of the Commission's rules, NANPA files the Industry's relief plan as an informal request and delayed the filing until after NeuStar provided an oral presentation of the Industry's recommended relief plan to the Commission at its regularly scheduled February 2001 meeting.

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2003.⁶ The Industry met on November 30, 2000, in Columbia, South Carolina, to discuss various relief alternatives.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief planning meeting.⁸ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of five relief alternatives for the 803 NPA, an all-services distributed overlay – referred to as Alternative #1 in the IPD and four geographic splits – referred to as Alternatives #2 - #5.

At the meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay plan, as the preferred means of relief for the 803 NPA. The Industry eliminated from consideration the geographic split alternatives because they would divide counties and local calling areas, create a confusing mixture of seven and 10-digit dialing, and could necessitate changes to the current 911 system and may affect the operations of various 911 agencies. The Industry also noted that Alternative #3 would split the Chester Telephone Company service territory and that Alternative #5 would split the metropolitan calling area. The Industry also stated that the projected life for the northern NPA created by the proposed split in Alternative #3 may be less than projected

⁶ 2000 COCUS and NPA Exhaust Analysis (May 23, 2000) ("2000 COCUS"). The 2000 COCUS can be accessed on the NANPA web site at <http://www.nanpa.com>.

⁷ A copy of the November 30 meeting minutes, meeting handouts and a list of attendees are attached as Exhibit A.

⁸ A copy of the IPD is attached as Attachment #5 to Exhibit A.

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because growth in the northern metropolitan area is greater than the average growth of the overall NPA.⁹

II. DESCRIPTION OF THE RECOMMENDED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

The recommended all-services distributed overlay, Alternative #1, would superimpose a new NPA over the same geographic area covered by the existing 803 NPA. All existing customers would retain the 803 area code and would not have to change their telephone numbers. In agreement with FCC regulations, the relief plan would require ten-digit dialing for calls within and between the 803 NPA and the new overlay NPA.¹⁰ When the 803 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #1 is eight years.

Industry participants reached consensus to recommend to the Commission a schedule for NPA relief implementation. The schedule, provided below, includes recommended implementation intervals for each implementation phase. The intervals are dependent upon the Commission's adoption of an all-services overlay as the means of relief for the 803 NPA.

⁹ See Attachment #3 to Exhibit A for a list of Industry agreed upon attributes for overlays and splits.

¹⁰ 47 C.F.R. §52.19(c)(3)(ii).

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RECOMMENDED RELIEF IMPLEMENTATION INTERVALS¹¹

Event	Time Interval (in Months)	Date Suggested
Commission Order	X	June 1, 2001 ¹²
Begin Permissive 10-Digit Dialing	X + 10	April 1, 2002
Mandatory 10-Digit Dialing	X + 16	October 1, 2002
First Code Activation in New NPA	X + 17	November 1, 2002

Adhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO codes.

III. CONCLUSION

The Industry has determined the need to initiate relief efforts for the 803 NPA in South Carolina to prevent the exhaust of numbering resources. The Industry respectfully requests that the Commission issue an order approving the Industry recommended all-services distributed overlay alternative as the means of relief for the 803 NPA.¹³ The Industry also requests that the Commission approve its recommended

¹¹ The relief implementation intervals timeline assumes an NPA exhaust of second quarter 2003.

¹² The Industry requests that the Commission issue an order no later than June 1, 2001.

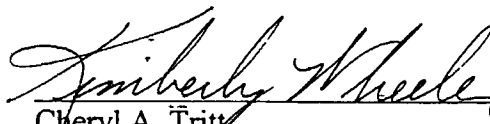
¹³ NANPA, on behalf of the Industry, filed a request for relief of the 843 NPA contemporaneously with the instant request. The Industry requests that the Commission consider relief for both NPAs concurrently.

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Letter to Gary Walsh
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Page 6

relief implementation schedule so that relief can be implemented sufficiently in advance of exhaust, thereby reducing the likelihood that CO codes will need to be rationed.

Respectfully submitted,


Cheryl A. Tritt
Kimberly D. Wheeler

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(202) 887-1500

Counsel for NeuStar, Inc.
North American Numbering Plan Administrator

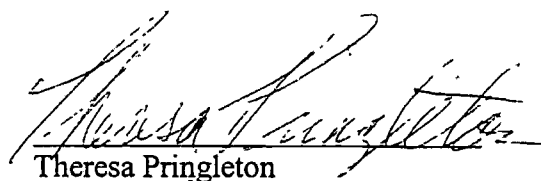
Thomas C. Foley
NPA Relief Planner -- Eastern Region
NeuStar, Inc.
North American Numbering Plan Administrator
1120 Vermont Avenue, N.W.
Washington, D.C. 20005
(407) 389-8929

CERTIFICATE OF SERVICE

I, Theresa Pringleton, do hereby certify that the foregoing **Informal Request** was delivered, via U.S. Mail, this 22nd day of February, 2001 to the following:

Consumer Advocate Counsel
Department of Consumer Affairs
3600 Forest Drive, 3rd Floor
Columbia, SC 29204

Thomas C. Foley
NPA Relief Planner - Eastern Region
NeuStar, Inc.
820 Riverbend Boulevard
Longwood, FL 32779-2327


Theresa Pringleton

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2003.⁶ The Industry met on November 14, 2000, in Columbia, South Carolina, to discuss various relief alternatives.⁷ Pursuant to the NPA Relief Planning Guidelines, NANPA distributed an Initial Planning Document ("IPD") to the Industry prior to the relief planning meeting.⁸ The IPD contained descriptions, maps, general facts and assumptions, and the projected lives of two relief alternatives for the 843 NPA: 1) an all-services distributed overlay – referred to as Alternative #1 in the IPD; and 2) a geographic split with the split boundary line running east to west dividing the existing 843 NPA approximately in half – referred to as Alternative #2.

At the meeting, the participants discussed the attributes of the relief alternatives and reached consensus to recommend to the Commission Alternative #1, an all-services distributed overlay plan, as the preferred means of relief for the 843 NPA. The Industry eliminated from consideration Alternative #2, the geographic split, because the split alternatives are more disruptive to customers than overlays. Alternative #2 would require that customers located in either Myrtle Beach or Charleston, two large metropolitan areas, to change their telephone numbers. The Industry also noted that customers located in the 843 area code changed their telephone numbers as recently as

⁶ 2000 COCUS and NPA Exhaust Analysis (May 23, 2000) ("2000 COCUS"). The 2000 COCUS can be accessed on the NANPA web site at <http://www.nanpa.com>.

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1998 when the 843 area code was created by splitting the 803 area code.⁹ The Industry stated that splits take longer to implement than an overlay.¹⁰

II. DESCRIPTION OF THE RECOMMENDED ALL-SERVICES DISTRIBUTED OVERLAY RELIEF PLAN

The recommended all-services distributed overlay, Alternative #1, would superimpose a new NPA over the same geographic area covered by the existing 843 NPA. All existing customers would retain the 843 area code and would not have to change their telephone numbers. In agreement with FCC regulations, the relief plan would require ten-digit dialing for calls within and between the 843 NPA and the new overlay NPA.¹¹ When the 843 NPA exhausts, all CO code assignments will be made in the new overlay area code. The projected life of Alternative #1 is eight years.

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⁹ Industry guidelines recommend that customers who undergo number changes not be required to change again for a period of 8 to 10 years. NPA Relief Planning Guidelines at §5.0.

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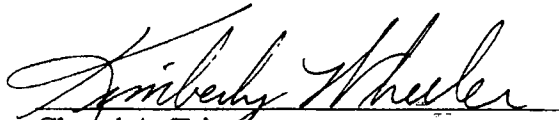
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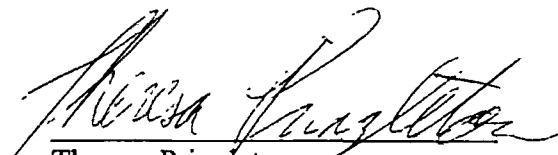
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NeuStar, Inc.
820 Riverbend Boulevard
Longwood, FL 32779-2327


Theresa Pringleton